



November 12, 2010

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 09-191, Preserving the Open Internet; WC Docket No. 07-52

Ms. Dortch:

As President and owner of a rural Northern Michigan Internet Services Provider for more than 15 years, a long-term advocate of rural Broadband development, a member of various committees and councils seeking rural Broadband solutions, and Vice President of the Northern Michigan Broadband Cooperative, I would like to offer my perspective on open Internet policies and network neutrality and how it may impact rural Broadband development.

It has been painfully clear that rural Broadband development is challenged by a lack of adequate return on investment to encourage private development and a lack of sufficient funding to overcome that problem. Actions that may increase the cost of development and operation, or decrease the potential for revenue to offset those costs, will certainly impact rural Broadband development. As such, policies that do not consider issues specific to rural Broadband development may continue to leave many rural residents with dial-up or expensive satellite services as their only option, or worse may put existing services out of business.

Open Internet and network neutrality policies that may require full equity among all protocols, services, and applications for all users flowing on necessarily more limited rural Broadband infrastructure prevent optimization of traffic for critical rural users. With revenue sources for rural Broadband services being more heavily weighted toward the public sector (governments, health care, education, etc.), servicing those users is critical to development and operation of these networks.

A regulatory environment where traffic cannot be optimized for those users, and critical commercial customers, would require the networks to be made more robust than economically possible in an effort to ensure those services are not regularly degraded. Requirements that all users and services receive equivalent performance and reliability will therefore necessarily render a good percentage of rural Broadband development impossible.

It is my opinion that unless there is a comprehensive plan to enable construction of high-capacity fiber infrastructure permitting neutral handling of all traffic, that open Internet and network neutrality rules that don't consider rural needs risk significant harm to existing and future rural Broadband development. I therefore encourage development of necessary open and neutral network policies, but with due consideration to those areas most challenged in development of Broadband services.

Sincerely,

Charles Scott, President
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